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8 Attorneys for Defendant Cheap Tech Guys LLC

9  
10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA, SOUTHERN DIVISION**

12 MICROSOFT CORPORATION, a  
13 Washington Corporation,

14 Plaintiff,

15 v.

16 CHEAP TECH GUYS LLC, a Nevada  
17 Limited Liability Company,

18 Defendant.

Case No. 2:21-cv-00284-APG-VCF

**STIPULATION AND ORDER TO  
EXTEND OPPOSITION DEADLINE TO  
MICROSOFT CORPORATION'S  
MOTION TO COMPEL DISCOVERY  
RESPONSES FROM DEFENDANT  
CHEAP TECH GUYS LLC**

**(First Request)**

Trial Date: None Set

19  
20 IT IS HEREBY STIPULATED by and between Plaintiff, MICROSOFT CORPORATION  
21 ("Plaintiff") by and through its counsel of record, the law firm of Greenberg Traurig, LLP, and  
22 Defendant, CHEAP TECH GUYS LLC ("Defendant"), by and through its counsel, the law firm of  
23 Wood, Smith, Henning & Berman, LLP, that the deadline to file an Opposition to Plaintiff's Motion  
24 to Compel Discovery Responses currently due on March 11, 2022 be extended until April 11, 2022.

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As contemplated by LR IA 6-1. This extension is requested for good cause. The undersigned counsel met and conferred and have agreed to an extension of time to allow the parties additional time to set this matter for a mediation to see if this matter can resolve prior to expending Court resources regarding the instant motion. The Plaintiff has previously extended a settlement demand, which has started the settlement negotiation discussions. Additionally, the extension is sought to avoid costs to the parties associated with litigating the instant motion including attorney's fees.

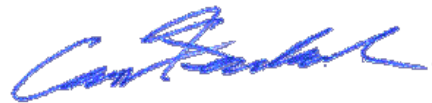
WHEREFORE, the aforementioned Parties, hereby agree, subject to the Court's approval, that the deadline to file the Defendant's Opposition to Plaintiff's Motion to Compel Discovery Responses be extended to April 11, 2022.

**IT IS SO STIPULATED.**

By /s/ Nicholas F. Adams  
 BROOKE A. BOHLKE  
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*Attorneys for Defendant*

By /s/ Christopher R. Miltenberger  
 CHRISTOPHER R. MILTENBERGER  
 Nevada Bar No. 10153  
 10845 Griffith Peak Dr., Suite 600  
 Las Vegas, NV 89135  
*Attorneys for Plaintiff*  
  
 Bonnie MacNaughton (*pro hac vice*)  
 Lindsey E. Mundt (*pro hac vice*)  
 DAVIS WRIGHT TREMAINE LLP  
 920 5th Avenue, Suite 3300  
 Seattle, WA 98104

**IT IS SO ORDERED.**



**UNITED STATES MAGISTRATE JUDGE**

DATED: 3-14-2022

WOOD, SMITH, HENNING & BERMAN LLP  
 Attorneys at Law  
 2881 BUSINESS PARK COURT, SUITE 200  
 LAS VEGAS, NEVADA 89128-9020  
 TELEPHONE 702 251 4100 ♦ FAX 702 251 5405

**CERTIFICATE OF SERVICE**

I hereby certify that on this 11<sup>th</sup> day of March, 2022, a true and correct copy of **STIPULATION AND ORDER TO EXTEND OPPOSITION DEADLINE TO MICROSOFT CORPORATION'S MOTION TO COMPEL DISCOVERY RESPONSES FROM DEFENDANT CHEAP TECH GUYS LLC (First Request)** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

By /s/Jeanne L. Calix

Jeanne L. Calix, an Employee of  
WOOD, SMITH, HENNING & BERMAN LLP

WOOD, SMITH, HENNING & BERMAN LLP  
Attorneys at Law  
2881 BUSINESS PARK COURT, SUITE 200  
LAS VEGAS, NEVADA 89128-9020  
TELEPHONE 702 251 4100 ♦ FAX 702 251 5405

## Jeanne Calix

---

**From:** miltenbergerc@gtlaw.com  
**Sent:** Thursday, March 10, 2022 6:31 PM  
**To:** Nick Adams; KellyGorton@dwt.com; BonnieMacNaughton@dwt.com  
**Cc:** Jeanne Calix; Brooke A. Bohlke; Niki Shadoan; rosehilla@gtlaw.com  
**Subject:** [EXTERNAL] RE: Microsoft Corporation v. Cheap Tech Guys, LLC - Case No.: 2:21-cv-00284-APG-VCF

Nick,

You can use my e-signature on the stipulation to submit it.

Thanks,

Chris Miltenberger  
Greenberg Traurig, LLP  
702.599.8024

---

**From:** Nick Adams <NAdams@wshblaw.com>  
**Sent:** Thursday, March 10, 2022 5:25 PM  
**To:** Miltenberger, Chris (Shld-LV-LT) <miltenbergerc@gtlaw.com>; Gorton, Kelly <KellyGorton@dwt.com>; MacNaughton, Bonnie <BonnieMacNaughton@dwt.com>  
**Cc:** Jeanne Calix <JCalix@wshblaw.com>; Brooke A. Bohlke <BBohlke@wshblaw.com>; Niki Shadoan <nshadoan@wshblaw.com>  
**Subject:** Microsoft Corporation v. Cheap Tech Guys, LLC - Case No.: 2:21-cv-00284-APG-VCF

**\*EXTERNAL TO GT\***

Hi all,

Attached is our proposed stipulation and order to extend the time to respond to the motion to compel. Please advise if I have your permission to use your e-signature so I can submit to the Court.

Thanks,



**Nick Adams**  
Associate

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